1 2 3 4 5 6 7 8 9 10	LEE H. RUBIN (SBN 141331) lrubin@mayerbrown.com EDWARD D. JOHNSON (SBN 189475) wjohnson@mayerbrown.com DONALD M. FALK (SBN 150256) dfalk@mayerbrown.com ERIC B. EVANS (SBN 232476) eevans@mayerbrown.com Two Palo Alto Square, Suite 300 3000 El Camino Real Palo Alto, CA 94306-2112 Telephone: (650) 331-2000 Facsimile: (650) 331-2061 Attorneys for Defendant Google Inc.		
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13	UNITED STATES DISTR		
14	NORTHERN DISTRICT OF		
	SAN JUSE DIVI	SAN JOSE DIVISION	
15	IN RE: HIGH-TECH EMPLOYEE M	laster Docket No. 11-CV-2509-LHK	
16	ANTITRUST LITIGATION	PROPOSED] ORDER GRANTING	
17	THIS DOCUMENT RELATES TO: $D_{\mathbf{A}}$	EFENDANTS' JOINT DMINISTRATIVE MOTION TO SEAL	
18	ALL ACTIONS		
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21	1		
22	$2 \parallel$		
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1	On December 10, 2012, Plaintiffs filed an administrative motion for a sealing order		
2	(Docket No. 246) pursuant to Northern District Civil Local Rule 79-5(d) and lodged under seal		
3	certain information contained in: (a) Plaintiffs' Consolidated Reply In Support of Motion for		
4	Class Certification and Opposition to Defendants' Motion to Strike the Report of Dr. Edward E.		
5	Leamer ("Reply"), (b) Exhibits 1-6, 9-10, and 12-30 to the Declaration of Dean Harvey filed in		
6	support of Plaintiffs' Reply ("Harvey Declaration"), and (c) portions of the Reply Expert Report		
7	of Dr. Edward Leamer, Ph.D. ("Expert Report"). This information has been designated		
8	Confidential or Attorneys-Eyes Only under the Stipulated Protective Order (Modified by the		
9	Court) (Dkt. No. 107).		
10	On December 17, 2012, Defendants filed the following Declarations in Support of		
11	Plaintiffs' Administrative Motion for a Sealing Order pursuant to Civil Local Rule 79-5(d):		
12	Flaments Administrative Motion for a Seating Order pursuant to Civil Local Rule 79-3(d).		
13	Defendant Adobe Systems, Inc. filed a Declaration of Lin W. Kahn;		
14	Defendant Apple Inc. filed a Declaration of Christina Brown;		
15	Defendant reprie me. med a Decidration of Christina Brown,		
16	Defendant Google Inc. filed a Declaration of Frank Wagner;		
17	Defendant Intel Corp. filed a Declaration of Susan J. Welch;		
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19	Defendant Intuit Inc. filed a Declaration of Catherine T. Zeng;		
20	Defendant Lucasfilm Ltd. filed a Declaration of Justina K. Sessions; and		
21	· · · · · · · · · · · · · · · · · · ·		
22	Defendant Pixar filed a Declaration of James M. Kennedy.		
23	GOOD CAUSE HAVING BEEN SHOWN, THE COURT HEREBY ORDERS that the		
24	following documents, figures, and portions thereof be filed under seal:		
25			
26	Plaintiffs' Reply in Support of Class Certification (Docket No. 247)		
27	i, Headings III.B.1, III.B.2, III.C, and III.D		
28	3:18-25		
	-2		

1	11:15-16
2	12:18-21
3	13:14-18
4	13:22-23
5	13:23-14:12
6	14 n.10
7	16:11-12
8	16:18-19
9	17: 13-18
10	17:14-22
11	17:15-19
12	17:15-22
13	17: 20-21
14	17:27-18:11
15	18:14-16
16	18:16-19
17	18:19-24
18	18:24-19:5
19	19:5-9
20	19:14-16
21	19:17-27
22	20:3-26
23	20:26-21:4
24	21:5-7
25	21: 7-13
26	21:13-14
27	21:14 & n.13
28	21 n. 13
	-3- PROPOSED ORDER (DEFENDANTS' JOINT ADMINISTRATIVE MOTION TO SEAL.)

PROPOSED ORDER (DEFENDANTS' JOINT ADMINISTRATIVE MOTION TO SEAL)
MASTER DOCKET NO. 11-CV-2509-LHK

1	21: n.13 lines 24-27
2	21 n.14
3	22:5-7
4	22:5-8
5	24:14-21
6	25: 1-6
7	Plaintiffs' Declaration of Dean M. Harvey in Support Reply (Docket Nos. 248-[—]):
8	Exhibits 1, 2, 10, 13, 18 (redacted portions)
9	Exhibits 3, 4, 6, 15, 16, 17, 19,
10	20, 22, 23, 24, 25, 26, 27, 29, 30 (entirety)
11	(Chenoty)
12	
13	
14	Plaintiffs' Reply Expert Report of Edward E. Leamer, Ph.D. (Docket No. 249):
15	Page i, Heading III.A
16	
17	Page i, Heading III.C
18	Paragraph 7 (last clause in second sentence, beginning "in response to"):
19	
20	Paragraph 14 (last four of six sentences and accompanying footnote 13)
21	Paragraph 15 (last sentence and accompanying footnote 15)
22	
23	Paragraph 16 (first two sentences and accompanying footnote 16)
24	Paragraph 32 (and accompanying footnote 34)
25	Handing A on Dago 19 Dagagraphs 46 47
26	Heading A on Page 18, Paragraphs 46-47
27	Paragraph 20
28	-4-

1	Paragraph 46	
2	Developed AC accorded from the contents	
3	Paragraph 46, second and fourth sentences	
4	Paragraph 46, footnote 47 and accompanying text	
5	D 1.46 16 4 47	
6	Paragraph 46, and footnote 47	
7	Paragraph 47, last sentence	
8	Paragraph 47 48, footnotes 52 53, and accompanying taxt	
9	Paragraph 47-48, footnotes 52-53, and accompanying text	
10	Paragraph 47, and footnotes 50, 51, and 53	
11	Heading C on Page 23, Paragraphs 50-53 (and accompanying footnotes 66-67 and	
12	69)	
13		
14	Paragraph 54 (last sentence)	
15	Paragraph 55	
16	r aragraph 33	
17	Paragraph 56 (first sentence)	
18	Paragraph 56	
19	Taragraph 30	
20	Paragraph 60	
21	Paragraphs 62, 63, and footnote 79	
22	Taragraphs 62, 63, and roomote 79	
23	Paragraph 64	
24	Paragraph 91	
25	Taragraph 71	
26	Paragraph 108	
27	Figure 1 (page 26)	
28		
	-5- PROPOSED ORDER (DEFENDANTS' JOINT ADMINISTRATIVE MOTION TO SEAL)	

1	Figure 2 (page 30)	
2	Figure 2 (no. 21)	
3	Figure 3 (page 31)	
4	Figure 5 (page 40)	
5	Figure 6 (page 42)	
6	Figure 6 (page 42)	
7	Figure 7 (page 43)	
8	Figure 8 (page 44)	
9	rigure o (page 11)	
10	Figure 9 (page 44)	
11	Figure 10 (page 45)	
12		
13	Figure 11 (page 45)	
14	Figure 12 (page 50)	
15		
16	Figure 13 (page 51)	
17	Figure 14 (page 52)	
18		
19	Figure 15 (page 53)	
20	Figure 16 (page 55)	
21	F' 17 (50)	
22	Figure 17 (page 56)	
23	Figure 18 (page 57)	
24	Figure 10 (page 59)	
2526	Figure 19 (page 58)	
27	Footnote 13 (page 5)	
28	Footnote 74 (page 25)	
20	-6-	
	PROPOSED ORDER (DEFENDANTS' JOINT ADMINISTRATIVE MOTION TO SEAL)	

1	IT IS SO ORDERED.	
2	Date:	HONODADI E I HOVII VOII
3		HONORABLE LUCY H. KOH United States District Court Judge
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